THE HONORABLE ROBERT S. LASNIK 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 AVOCENT REDMOND CORP., a No. C06-1711 RSL Washington corporation, 10 Plaintiff, **DEFENDANT'S STATEMENT IN** 11 RESPONSE TO ORDER TO SHOW CAUSE ٧. 12 ROSE ELECTRONICS, a Texas general 13 partnership; PETER MACOUREK, an individual; DARIOUSH "DAVID" RAHVAR, an individual; ATEN TECHNOLOGY INC., a 14 California corporation; ATEN INTERNATIONAL CO., LTD., a Taiwanese 15 Company; TRIPPE MANUFACTURING 16 COMPANY, an Illinois corporation; BELKIN INTERNATIONAL, INC., a Delaware corporation, and BELKIN, INC., a Delaware 17 corporation, 18 Defendants. 19 20 Belkin's local counsel, Corr Cronin Michelson Baumgardner & Preece LLP, hereby 21 files this response in relation to the Court's Order to Show Cause of December 21, 2011. 22 Given the length of the documents submitted, Belkin's local counsel erroneously believed that 23 the Court would prefer to access to these materials on a CD and provided that CD to the Court 24 with a copy of the filing this past Monday. Belkin's local counsel apologizes for this error, 25

DEFENDANT'S STATEMENT IN RESPONSE TO ORDER TO SHOW CAUSE – Page 1 No. C06-1711 RSL CORR CRONIN MICHELSON
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acknowledges that it should have provided a paper copy of the exhibits to the Court with the filing, and will provide a paper copy of the filing no later than the close of business today.

To the extent that the Court believes sanctions are warranted under these circumstances, the responsibility for this error should be attributed solely to Belkin's local counsel (Corr Cronin), not Belkin, other Defendants, or other counsel for the Defendants.

Dated: December 22, 2011

Respectfully submitted,

CORR CRONIN MICHELSON BAUMGARDNER & PREECE LLP

s/ Michael A. Moore Michael A. Moore, WSBA No. 27047

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Attorneys for Defendants Belkin International, Inc. and Belkin, Inc.

CERTIFICATE OF SERVICE 1 I hereby certify that on December 22, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to 2 the following: 3 John A. Knox Robert W. Dickerson Williams, Kastner & Gibbs PLLC Yasser El-Gamal 4 601 Union Street, Suite 4100 Dickstein Shapiro, LLP Seattle, Washington 98101-2380 2049 Century Park East, Suite 700 5 jknox@wkg.com Los Angeles, CA 90067 dickersonr@dicksteinshapiro.com 6 James D. Berquist elgamaly@dicksteinshapiro.com J. Scott Davidson 7 Donald L. Jackson Jeffrey A. Miller Dickstein Shapiro, LLP DAVIDSON BERQUIST JACKSON & 8 GOWDEY, LLP 700 Hanson Way 4300 Wilson Blvd, Suite 700 Palo Alto, CA 94304 9 Arlington, Virginia 22203 millerj@dicksteinshapiro.com jay.berquist@davidsonberquist.com 10 scott.davidson@davidsonberquist.com David P. Enzminger Winston & Strawn LLP dlj@dbjg.com 11 333 South Hope Street Thomas F. Ahearne Los Angeles, CA 90071 12 Joel B. Ard denzminger@winston.com Foster Pepper PLLC 13 1111 Third Avenue, Suite 3400 Jeffrey J. Phillips Seattle, WA 98101-3299 Winston & Strawn LLP 14 1111 Louisiana, 25th Floor ahearne@foster.com ArdJB@foster.com Houston, TX 77002 15 jphillips@winston.com Ming-Tao Yang 16 Gregory K. Storey Finnegan, Henderson, Farabow, Garrett & 17 Dunner, LLP 3300 Hillview Avenue 18 Palo Alto, CA 94304-1203 Ming.yang@finnegan.com 19 greg.storey@finnegan.com s/ Michael A. Moore 20 Michael A. Moore, WSBA No. 27047 CORR CRONIN MICHELSON 21 BAUMGARDNER & PREECE LLP 1001 Fourth Avenue, Suite 3900 22 Seattle, Washington 98154-1051 Telephone: (206) 625-8600 23

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